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TOBACCO LITIGATION TEAM

Civil Action No. 99-CV-2496 (GK)

**Next Scheduled Court Appearance:**

July 18, 2002

et al.,

Defendants.

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**REQUEST NO. 215:** [Withdrawn by Plaintiff.]

**REQUEST NO. 216:** [Withdrawn by Plaintiff.]

**REQUEST NO. 217:** [Withdrawn by Plaintiff.]

**ENVIRONMENTAL TOBACCO SMOKE OR SECONDHAND SMOKE**

**REQUEST NO. 218:** Admit that environmental tobacco smoke (“ETS”) causes disease in some people.

**RESPONSE:** Subject to and without waiving its objections, Reynolds states that it does not believe that the scientific evidence concerning ETS establishes it as a cause of, or a risk factor for, lung cancer, heart disease, or any other disease in adult nonsmokers. Further responding, Reynolds states that it is aware of scientific literature reporting that exposure to ETS is associated with various childhood respiratory diseases.

Reynolds objects to this request on the grounds that it is overly broad, vague and ambiguous among other things in its use of the phrase “causes disease.” Reynolds further objects to this request on the ground that it does not purport to seek an admission regarding facts or the application of law to fact, but instead improperly seeks to require Reynolds to admit or deny a matter reflecting opinions and interpretations of scientific and medical judgments.

**REQUEST NO. 219:** Admit that you have never admitted that ETS has caused disease in a particular person or a particular group of persons.